

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>2/25/2015</u>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA
:
- v. -
:
SHELDON SILVER,
:
Defendant.
:
- - - - - X

15 Cr. 93 (VEC)

PROTECTIVE ORDER ON CONSENT

On the motion of the United States of America, by the United States Attorney for the Southern District of New York, Preet Bharara, by Assistant United States Attorneys Carrie H. Cohen, Howard S. Master and Andrew D. Goldstein; and with the consent of the defendant, SHELDON SILVER, by and through his counsel, Joel Cohen, Esq., Steven Molo, Esq. and Justin Shur, Esq., and for good cause shown,

IT IS HEREBY ORDERED THAT:

1. Discovery material produced by the Government in this action that contains account numbers, social security numbers, dates of birth, addresses, telephone numbers, information related to legal representation, and information related to medical issues, including records potentially protected by the Health Insurance Portability and Accountability Act and is not otherwise publicly available, is considered to be "Restricted Information."
2. Restricted Information disclosed to the defendant or to his counsel during the course of proceedings in this action:

(a) Shall be used by the defendant or his counsel only for purposes of this action;

(b) Shall not be distributed or disclosed in any form by the defendant or his counsel except as set forth in paragraph 2(c) below;

(c) May be disclosed by the defendant or his counsel only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's attorneys;

(ii) independent expert witnesses, investigators or advisors retained by the defendant or on his behalf in connection with this action;

(iii) fact witnesses or other third-parties interviewed or consulted by the defendant's counsel or a member of the defense team in the course of investigating the case;

(iv) such other persons as hereafter may be authorized by the Court upon such motion by the defendant; and

(d) Shall be returned to the Government following the conclusion of this case together with any and all copies of thereof, or shall be destroyed together with any and all copies thereof, which destruction the defendant's counsel shall verify in writing.

3. The defendant or his counsel shall provide a copy of this Order to any Designated Persons to whom Restricted Information is disclosed pursuant to paragraphs 2(c). Designated Persons shall be subject to the terms of this Order.

4. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court for purposes of this action.

Dated: New York, New York
February 25, 2015

SO ORDERED:



THE HONORABLE VALERIE E. CAPRONI
UNITED STATES DISTRICT JUDGE

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Plaintiff

By:



Carrie H. Cohen
Howard S. Master
Andrew D. Goldstein
Assistant United States Attorneys

2/24/15

Date

SHELDON SILVER

By:



Joel Cohen, Esq.
Steven Molo, Esq.
Justin Shur, Esq.
Attorneys for Sheldon Silver

2/24/15

Date